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May 31, 2005

*Docket No. 05-015-1
Regulatory Analysis and Development
PPD, APHIS
Station 3C71
4700 River Road Unit 118
Riverdale, MD 20737-1238*

*Re: NAIS Draft Strategic Plan; NAIS Draft
Program Standards*

Dear Sirs:

*I would like to see APHIS handle our Animal ID program as is outlined
in the NAIS Draft Program.*

*There are several drawbacks to private industry handling the information
needed to run such a system.*

*(1) Private databases would have to be profitable to the information
gathering entity, and much opportunity for graft and gouging of the
producer would exist. Also, what would happen to the information gathered
if the database went out of business? Would it be sold, and how could the
individual be sure his information was safe*

*(2) If NAIS did allow privately managed databases, there should be
multiple ones, but I think that would be much more confusing than the NAIS
plan. Also, Organizations such as NCBA are way too close to the Packers,
and opportunity would exist for trading of information. I do not think they
could resist the temptation, and I am a member of NCBA. This would play
havoc with our markets and would be very hard to prove.*

(3) If we do have a privately managed system, all species should be

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included, and again, I think this is better handled by USDA's APHIS.

(5) I do not think private systems would work well at National or State levels. Too much opportunity would exist for use of information concerning one part of the industry against it for the benefit of other parts of the industry. It would be hard to coordinate, and important information could be lost or sold through private treaty.

Please continue with your plan for NAID thru APHIS. I am a rancher in Texas, and I feel my herd information will be safer with APHIS than with one or multiple private database systems.

Sincerely,

Rosalee Coleman